

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

OLIVIA Y., et al.,

Plaintiffs,

v.

TATE REEVES, as Governor of the
State of Mississippi, et al.,

CIVIL ACTION NO.
3:04-CV-251-DCB-FKB

Defendants.

**PLAINTIFFS' MOTION FOR PAYMENT OF
PLAINTIFFS' ATTORNEYS' FEES AND EXPENSES**

Plaintiffs, Olivia Y., et al., by and through their undersigned counsel and pursuant to 42 U.S.C. § 1988 and Rules 23(h) and 54(d)(2) of the Federal Rules of Civil Procedure, respectfully request that the court approve the parties' agreement regarding Plaintiffs' attorneys' fees and expenses in the agreed-upon amount as follows:

A Better Childhood, Inc. \$40,859.62

The parties agreed this sum will be paid by Defendants for monitoring and enforcement work performed by Plaintiffs' counsel on behalf of the Plaintiff Class from July 1, 2020, through December 31, 2020. However, the parties are unable to agree upon a reasonable timeframe for payment of the agreed-upon amount. Plaintiffs request timely payment of the agreed-to attorneys' fees and expenses within thirty (30) days from entry of the order.

In support of this motion, Plaintiffs offer the following exhibits:

Exhibit 1: Declaration of Marcia Robinson Lowry (Feb 4, 2021)

RESPECTFULLY SUBMITTED, this the 4th day of February 2021.

/s/ Marcia Robinson Lowry

Marcia Robinson Lowry (pro hac vice)

Anastasia Benedetto (pro hac vice)

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CERTIFICATE OF SERVICE

I hereby certify that on February 4th, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will deliver copies to all counsel of record.

/s/ Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)